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9 Attorneys for Cross-Defendant
10 Church of Scientology of California

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 FOR THE COUNTY OF LOS ANGELES

14 CHURCH OF SCIENTOLOGY OF) CASE NO. C 420 153
15 CALIFORNIA, a California)
Corporation,) [Severed Action]
16)
Plaintiff,)
17)
v.)
18)
GERALD ARMSTRONG, et al.,)
19)
Defendants.)
20)
21)
AND RELATED CROSS-ACTION.)
22)

23 I, DONALD C. RANDOLPH, do declare as follows:

24 1. I am an attorney at law, a member in good standing of
25 the bar of this Court, and counsel of record in the above
26 entitled case.

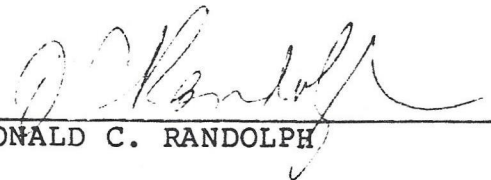
27 2. On November 25, 1985, I spoke with Fred Bennett, Deputy
28 County Counsel, regarding the subpoena duces tecum issued on

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behalf of cross-defendant requesting the logs and records herein re: access to the sealed documents in this case. Mr. Bennett informed me that his client, Mr. Jerry Nottke requires a court order for granting access to these documents prior to his compliance with the subpoena. Mr. Bennett stated that he had no objection to such an order being issued by this Court, but agreed that it was appropriate in light of the prior attention given the sealed documents. I also agreed that such an order was appropriate under these circumstances.

I declare under penalty of prejury that the above is true and correct.

Executed this 13th day of February, 1986 at Los Angeles, California.


DONALD C. RANDOLPH